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-and-

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Counsel for Ad Hoc Group of Subrogation Claim Holders

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088

Chapter 11

(Lead Case)

(Jointly Administered)

**MOTION OF THE AD HOC GROUP OF
SUBROGATION CLAIM HOLDERS FOR
RELIEF FROM THE AUTOMATIC STAY**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric
Company

☒ Affects both Debtors

Date: July 24, 2019

Time: 9:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

**All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Objection Deadline: July 19, 2019 at 4:00 p.m.

1 PLEASE TAKE NOTICE that on July 24, 2019, at 9:30 AM or as soon thereafter as the
2 matter may be heard, in Courtroom 17, at 450 Golden Gate Avenue, San Francisco, CA 94102,
3 of the United States District Court, Northern District of California, Bankruptcy Court, the Ad
4 Hoc Group of Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”) will move for
5 relief from the automatic stay under Bankruptcy Code section 362(d) in order to pursue claims
6 of the Ad Hoc Subrogation Group’s members against PG&E Corporation and Pacific Gas and
7 Electric Company (hereinafter “**PG&E**” or the “**Debtors**”) regarding the issue of the Debtors’
8 liability for the Tubbs Fire in the California Superior Court, where the claims are currently
9 pending in a Coordination Proceeding, Case No. 4955.
10

11 This Motion is made pursuant to Bankruptcy Code section 362(d) on the grounds that
12 efficient administration of the estate and concerns of judicial economy weigh in favor of lifting
13 the automatic stay and allowing the San Francisco County Superior Court to hear the Ad Hoc
14 Subrogation Group’s claims.
15

16 This Motion has been noticed and scheduled pursuant to the *Second Amended Order*
17 *Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019
18 (ECF No. 1996) (“**Case Management Order**”). This Motion is based upon the Motion, the
19 Memorandum of Points and Authorities in Support of the Ad Hoc Group of Subrogation Claim
20 Holders’ Motion for Relief from the Automatic Stay and points and authorities therein, the
21 Declaration of Benjamin P. McCallen and supporting exhibits, the Notice of Hearing, and such
22 other and further evidence and matters that this Court may consider.
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Dated: July 3, 2019

WILLKIE FARR & GALLAGHER LLP

/s/ Benjamin P. McCallen

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